

FILED

SEP 18 2024
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. S2 4:24-cr-00002-SEP-JMB

MICHAEL GRODNER,
ANTHONY RAMOS,
RUBEN VIRUET-STEVENSON,
TIMOTHY DERRICO,
SUZANNE ACCURSO,
OLADIRAN AJAYI-OBE a/k/a "TJ",
RICHARD OWENS a/k/a "POPS",
HENNA HARRIS a/k/a "H",
PAVEL GIL a/k/a "SUPREME",
GIOVANNI RESTO a/k/a "G2",
DARRYL MATTHEWS JR.,
DAQASHAUN PARKS a/k/a "HANK",
MARK SKIESTO,
RALPH VALSECHI, and
CHRISTOPHER PEREZ,

Defendants.

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that, at times relevant to this Indictment:

INTRODUCTION

1. The defendants and others were members of a bank-fraud conspiracy. The conspiracy had an organized hierarchy: it had a leader; it had managers who reported to the leader and supervised their own crews; and it had lower-level participants who played various roles in the crews—some recruited other conspirators, some drove other conspirators to banks, some shipped packages containing counterfeit ID cards to other conspirators, and some went inside banks to carry out the bank-fraud scheme.

2. The bank-fraud scheme was a coordinated, multi-step process. The leader obtained banking and other personally identifiable information of victim bank account holders, and had another conspirator produce counterfeit ID cards that contained the names and dates of birth of the victim bank account holders but displayed photographs of other conspirators. The counterfeit ID cards were later provided to the managers, who traveled with their crews to states where the victim bank account holders' banks were located. Before the crews went to the banks, the leader supplied the managers with the banking and other personally identifiable information of the victim bank account holders. The managers, in turn, shared that information, as well as the counterfeit ID cards, with other conspirators in their crews. When the crews went to the banks, the conspirators whose photographs were displayed on the counterfeit ID cards impersonated the victim bank account holders and fraudulently withdrew money from their accounts.

3. The defendants and other conspirators carried out the bank-fraud scheme in at least 19 states, including within the Eastern District of Missouri. In doing so, they fraudulently obtained, or fraudulently attempted to obtain, more than \$450,000 from more than 30 different banks.

FEDERALLY-INSURED FINANCIAL INSTITUTIONS

4. Each of the banks listed below is a "financial institution" within the meaning of 18 U.S.C. § 20(1), in that the deposits of each are insured by the Federal Deposit Insurance Corporation ("FDIC"), and each has branch locations in, among other places, the states specified below:

- a. BancFirst: Oklahoma;
- b. Bangor Savings Bank: Maine;
- c. Bank of Utah: Utah;

- d. Banner Bank: Oregon and Washington;
- e. BMO Bank National Association (“BMO”): Wisconsin;
- f. BOKF, National Association (“BOKF”): Arizona, New Mexico, and Texas;
- g. Bristol County Savings Bank: Rhode Island;
- h. Cache Valley Bank: Utah;
- i. Camden National Bank: Maine;
- j. Columbia State Bank n/k/a Umpqua Bank (“Columbia State Bank”):

Oregon and Washington;

- k. Commerce Bank: Missouri;
- l. FirstBank: Colorado;
- m. First Community Bank: Utah;
- n. First Horizon Bank: Louisiana;
- o. First Interstate Bank: Colorado;
- p. First Utah Bank: Utah;
- q. German American Bank: Indiana and Kentucky;
- r. Ixonia Bank: Wisconsin;
- s. Johnson Bank: Wisconsin;
- t. Maine Community Bank: Maine;
- u. Manasquan Bank: New Jersey;
- v. Monona Bank n/k/a Lake Ridge Bank (“Monona Bank”): Wisconsin;
- w. Norway Savings Bank: Maine;
- x. Partners Bank of New England (“Partners Bank”): New Hampshire;

- y. Simmons Bank: Arkansas;
- z. Stock Yards Bank & Trust Company (“Stock Yards”): Kentucky;
- aa. The Washington Trust Company, of Westerly (“Washington Trust”): Rhode Island;
- bb. Town Bank, National Association (“Town Bank”): Wisconsin;
- cc. UMB Bank, National Association (“UMB Bank”): Arizona, Kansas, and Missouri;
- dd. Washington Federal Bank (“WaFd Bank”): Washington;
- ee. Waukesha State Bank: Wisconsin;
- ff. Westbury Bank: Wisconsin;
- gg. Wisconsin Bank & Trust: Wisconsin; and
- hh. Zions Bankcorporation, N.A. (“Zions Bank”): Utah.

COUNT ONE
(Bank Fraud Conspiracy: 18 U.S.C. § 1349)

5. Beginning by at least in or around August 2022, and continuing through at least in or around February 2024, within the Eastern District of Missouri and elsewhere, the defendants,

**MICHAEL GRODNER,
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MARK SKIESTO,**

**RALPH VALSECHI, and
CHRISTOPHER PEREZ,**

voluntarily and intentionally combined, conspired, confederated, and agreed with one another and others, known and unknown to the Grand Jury, to commit bank fraud, that is, to knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institutions by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

6. The object of the conspiracy was to fraudulently obtain money from FDIC-insured banks by using counterfeit ID cards to impersonate victims who had legitimate accounts at the banks and make unauthorized withdrawals from those accounts.

MANNER AND MEANS OF THE CONSPIRACY

It was part of that conspiracy that:

ROLES OF THE CONSPIRATORS

Organizer and Leader

7. Defendant Pavel Gil a/k/a “Supreme” (“Defendant Gil”) was an organizer and leader of the conspiracy.

8. Defendant Gil recruited Defendant Oladiran Ajayi-Obe a/k/a “TJ” (“Defendant Ajayi-Obe”), as well as other conspirators, known and unknown to the Grand Jury, to manage and supervise their own crews of conspirators.

9. Defendant Gil obtained banking and other personally identifiable information of victim bank account holders (“victim bank account holders’ PII”).

10. Defendant Gil supplied the victim bank account holders' PII to Defendant Ajayi-Obe, as well as to other conspirators, known and unknown to the Grand Jury.

11. At Defendant Gil's direction, Defendant Giovanni Resto ("Defendant Resto") manufactured counterfeit identification documents, including counterfeit ID cards such as counterfeit United States passport cards and counterfeit state driver's licenses that contained the names and dates of birth of the victim bank account holders but displayed photographs of other conspirators.

12. Defendant Gil, either personally or through other conspirators, including Defendant Resto, supplied the counterfeit ID cards and other counterfeit identification documents to Defendant Ajayi-Obe, as well as to other conspirators, known and unknown to the Grand Jury.

Manager and Supervisor

13. Defendant Ajayi-Obe, as well as other conspirators, known and unknown to the Grand Jury, was a manager and supervisor within the conspiracy, in that he ran his own crew of conspirators.

14. Defendant Ajayi-Obe booked flights, rented vehicles, and arranged Airbnb and hotel stays so that he and other conspirators who were part of his crew could travel to and from various states throughout the country where the victim bank account holders' banks were located.

15. After receiving the victim bank account holders' PII and the counterfeit ID cards, Defendant Ajayi-Obe distributed those materials to other conspirators who were part of his crew.

16. Defendant Ajayi-Obe and other conspirators who were part of his crew played one or more of the following roles:

a. Face: A “face” (also known as a “worker” or a “head”) was a conspirator who carried out the bank-fraud scheme by going inside banks and using the victim bank account holders’ PII and the counterfeit ID cards to impersonate the victim bank account holders and make fraudulent withdrawals from their bank accounts.

b. Driver: A driver was a conspirator who drove faces to banks for the purpose of carrying out the bank-fraud scheme.

c. Recruiter: A recruiter was a conspirator who recruited others to join the conspiracy.

d. Shipper: A shipper was a conspirator who shipped counterfeit ID cards to Defendant Ajayi-Obe while his crew was in various states carrying out the bank-fraud scheme.

Crew Members

17. Defendant Ajayi-Obe’s crew consisted of the conspirators listed below, as well as other conspirators, known and unknown to the Grand Jury.

18. In addition to being the manager and supervisor of his crew, Defendant Ajayi-Obe was also a driver and a recruiter for his crew. Defendant Ajayi-Obe recruited Defendant Daqashaun Parks a/k/a “Hank” (“Defendant Parks”), Defendant Darryl Matthews Jr. (“Defendant Matthews”), Defendant Anthony Ramos (“Defendant Ramos”), Defendant Timothy Derrico (“Defendant Derrico”), Defendant Christopher Perez (“Defendant Perez”), conspirator Clemente Castracucco, Defendant Ruben Viruet-Stevens (“Defendant Viruet-Stevens”), and conspirator Paul Keenan to be part of his crew.

19. Defendant Parks was a driver, a recruiter, and a shipper for Defendant Ajayi-Obe’s crew. Defendant Parks recruited Defendant Suzanne Accurso (“Defendant Accurso”) and

conspirator Casey Sedberry to be faces for Defendant Ajayi-Obe's crew. Defendant Parks shipped counterfeit ID cards to Kentucky and Alabama while Defendant Ajayi-Obe and his crew were in those states carrying out the bank-fraud scheme.

20. Defendant Matthews was a recruiter for Defendant Ajayi-Obe's crew. Defendant Matthews recruited Defendant Ralph Valsechi ("Defendant Valsechi") to be a face for Defendant Ajayi-Obe's crew. Defendant Matthews also recruited Defendant Richard Owens a/k/a "Pops" ("Defendant Owens") to be another recruiter for Defendant Ajayi-Obe's crew.

21. Defendant Owens, together with Defendant Henna Harris a/k/a "H" ("Defendant Harris"), recruited Defendant Michael Grodner ("Defendant Grodner") to be a face for Defendant Ajayi-Obe's crew.

22. Defendant Ramos was a driver for Defendant Ajayi-Obe's crew.

23. Defendant Viruet-Stevens traveled to the Eastern District of Missouri to learn the mechanics of the bank-fraud scheme so that he could be a driver for Defendant Ajayi-Obe's crew.

24. Defendant Perez was a shipper for Defendant Ajayi-Obe's crew. Defendant Perez shipped counterfeit ID cards to Arizona and Wisconsin while Defendant Ajayi-Obe and his crew were in those states carrying out the bank-fraud scheme.

25. In addition to Defendant Accurso, Defendant Valsechi, Defendant Grodner, and conspirator Casey Sedberry, other faces for Defendant Ajayi-Obe's crew included Defendant Derrico, Defendant Mark Skiesto ("Defendant Skiesto"), conspirator Clemente Castracucco, and conspirator Paul Keenan.

MECHANICS OF THE CONSPIRACY

26. After Defendant Gil obtained the victim bank account holders' PII, Defendant Gil informed Defendant Ajayi-Obe of the state where the victim bank account holders' banks were located.

27. Once Defendant Ajayi-Obe received this information from Defendant Gil, Defendant Ajayi-Obe determined which members of his crew would travel with him to that state to carry out the bank-fraud scheme.

28. After making that determination, Defendant Ajayi-Obe typically provided Defendant Gil, and occasionally provided Defendant Resto, with photographs of the faces in his crew that would be traveling with him to that state.

29. At Defendant Gil's direction, Defendant Resto manufactured counterfeit ID cards that contained the names and dates of birth of the victim bank account holders but displayed photographs of the faces.

30. Defendant Ajayi-Obe also arranged travel for himself and the other members of his crew, either by booking flights or by renting one or more vehicles, so that they could go to the state where the victim bank account holders' banks were located. If the trip required Defendant Ajayi-Obe and the other members of his crew to fly, Defendant Ajayi-Obe arranged for rental cars, as well as Airbnb or hotel stays, so that his crew had transportation and lodging in that state.

31. Defendant Ajayi-Obe obtained counterfeit checks before leaving on the trip. Defendant Ajayi-Obe also typically obtained the counterfeit ID cards, either from Defendant Gil or from Defendant Resto, before leaving on the trip. Sometimes, however, Defendant Ajayi-Obe

had another conspirator ship the counterfeit ID cards to him once he and the other members of his crew arrived in the state where the victim bank account holders' banks were located.

32. After Defendant Ajayi-Obe and the other members of his crew arrived in the state where the victim bank account holders' banks were located, they drove to the banks for the purpose of carrying out the bank-fraud scheme.

33. Before driving to the banks, Defendant Ajayi-Obe informed Defendant Gil of the names of the victim bank account holders that were contained on the counterfeit ID cards. Defendant Gil then provided Defendant Ajayi-Obe with the victim bank account holders' PII, such as the names of the victims' banks, the approximate balances in the victims' bank accounts, the victims' addresses, the victims' social security numbers, the victims' phone numbers, and the victims' email addresses.

34. If there were multiple drivers and faces on the trip, then the crew split up, with each driver being assigned to work with a different face. When the crew split up, Defendant Ajayi-Obe provided each driver with counterfeit checks and with counterfeit ID cards that displayed the photograph of the face assigned to work with that driver. Defendant Ajayi-Obe also provided either the driver or the face with the victim bank account holders' PII.

35. After arriving at the victims' banks, the drivers waited in the vehicles while the faces went inside the banks and used the counterfeit ID cards to impersonate the victim bank account holders. Typically, the faces deposited counterfeit checks into the victims' bank accounts and then immediately withdrew money from the accounts. On some occasions, however, the faces simply withdrew money from the victims' bank accounts without first depositing counterfeit checks.

36. On some occasions when his crew's trip lasted for more than a day, Defendant Ajayi-Obe notified Defendant Gil that his crew needed more counterfeit ID cards. Defendant Gil then directed Defendant Resto to manufacture additional counterfeit ID cards, and either Defendant Gil or Defendant Resto had another conspirator ship the counterfeit ID cards to Defendant Ajayi-Obe or other members of his crew, typically through FedEx.

37. If Defendant Ajayi-Obe's crew successfully carried out the bank-fraud scheme during a trip, Defendant Ajayi-Obe retained approximately 30% of the proceeds, some of which he shared with the other members of his crew. Defendant Ajayi-Obe distributed the remaining proceeds to Defendant Gil.

38. Between in or around August 2022 and in or around February 2024, the conspirators used the manner and means described above to carry out the bank-fraud scheme at more than 30 FDIC-insured banks in at least 19 different states. In doing so, the conspirators fraudulently obtained, or fraudulently attempted to obtain, more than \$450,000 from those banks, including, but not limited to, on the following occasions:

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
8/18/22	WaFd	Auburn, WA	Castracucco Ajayi-Obe	\$4,500	\$6,000
8/18/22	Banner Bank	Federal Way, WA	Castracucco Ajayi-Obe	None	\$2,500
8/18/22	Banner Bank	Kent, WA	Castracucco Ajayi-Obe	\$3,900	\$3,900
8/18/22	Columbia State Bank	Auburn, WA	Castracucco Ajayi-Obe	\$4,500	\$6,500
8/19/22	WaFd	Federal Way, WA	Castracucco Ajayi-Obe	\$4,500	\$6,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
8/23/22	Banner Bank	Mercer Island, WA	Castracucco Derrico Ajayi-Obe	\$4,500	None
8/24/22	WaFd	Kent, WA	Castracucco Derrico Ajayi-Obe	\$4,500	\$4,500
8/25/22	Columbia State Bank	Auburn, WA	Castracucco Derrico Ajayi-Obe	\$4,500	\$6,500
8/25/22	Banner Bank	Renton, WA	Castracucco Derrico Ajayi-Obe	None	\$6,500
9/13/22	Columbia State Bank	Salem, OR	Castracucco Ajayi-Obe	\$4,500	\$6,500
9/13/22	Banner Bank	Tualatin, OR	Castracucco Ajayi-Obe	\$4,500	None
9/14/22	Columbia State Bank	Tigard, OR	Castracucco Ajayi-Obe	\$4,500	\$6,500
9/22/22	German American Bank	Greensburg, IN	Castracucco Ajayi-Obe	None	\$6,000
9/22/22	German American Bank	Columbus, IN	Castracucco Ajayi-Obe	None	\$4,500
10/4/22	German American Bank	La Grange, KY	Castracucco Ajayi-Obe	\$4,500	\$7,000
10/4/22	German American Bank	Shelbyville, KY	Castracucco Ajayi-Obe	\$4,500	\$4,000
10/6/22	Stock Yards	Mt. Washington, KY	Castracucco Ajayi-Obe	\$4,500	\$4,000
10/6/22	Stock Yards	Louisville, KY	Castracucco Ajayi-Obe	\$4,500	\$6,000
10/6/22	Stock Yards	Shepherdsville, KY	Castracucco Ajayi-Obe	\$4,500	\$6,500
10/6/22	Stock Yards	Hillview, KY	Castracucco Ajayi-Obe	\$4,500	None

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
10/11/22	Stock Yards	Winchester, KY	Castracucco Ajayi-Obe Derrico Parks	\$4,500	\$7,000
10/13/22	Stock Yards	Lexington, KY	Castracucco Ajayi-Obe Derrico Parks	\$4,500	None
10/13/22	German American Bank	Shelbyville, KY	Castracucco Ajayi-Obe Derrico Parks	None	\$7,500
10/27/22	BOKF	Albuquerque, NM	Castracucco Ajayi-Obe	\$4,500	\$7,500
10/27/22	BOKF	Albuquerque, NM	Castracucco Ajayi-Obe	None	\$5,000
11/1/22	UMB Bank	Peoria, AZ	Castracucco Ajayi-Obe Ramos Accurso Parks	\$4,500	\$7,500
11/1/22	UMB Bank	Phoenix, AZ	Castracucco Ajayi-Obe Ramos Accurso Parks	None	\$6,000
11/1/22	BOKF	Mesa, AZ	Castracucco Ajayi-Obe Ramos Accurso Parks	\$4,500	\$7,500
11/9/22	Cache Valley Bank	Bountiful, UT	Castracucco Ajayi-Obe	\$4,500	\$7,500
11/9/22	Bank of Utah	Roy, UT	Castracucco Ajayi-Obe	\$4,500	\$9,000
11/9/22	First Utah Bank	Salt Lake City, UT	Castracucco Ajayi-Obe	\$4,500	\$7,500
11/9/22	Zions Bank	Salt Lake City, UT	Castracucco Ajayi-Obe	\$4,500	\$9,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
11/9/22	Zions Bank	Salt Lake City, UT	Castracucco Ajayi-Obe	\$4,500	\$4,500
11/9/22	First Utah Bank	West Valley City, UT	Castracucco Ajayi-Obe	\$4,500	\$6,000
11/10/22	First Utah Bank	Lehi, UT	Castracucco Ajayi-Obe	\$4,500	None
11/10/22	First Utah Bank	Midvale, UT	Castracucco Ajayi-Obe	\$4,500	\$7,500
11/10/22	Bank of Utah	West Valley City, UT	Castracucco Ajayi-Obe	\$4,500	\$7,000
11/10/22	First Community Bank	Bountiful, UT	Castracucco Ajayi-Obe	\$4,500	\$9,000
11/18/22	BOKF	Dallas, TX	Castracucco Ajayi-Obe Ramos	\$4,500	None
11/29/22	Waukesha State Bank	New Berlin, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$6,500
11/29/22	Westbury Bank	Germantown, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$3,500
11/30/22	Johnson Bank	Racine, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$8,000
11/30/22	Johnson Bank	Kenosha, WI	Castracucco Ajayi-Obe Ramos Accurso	None	\$5,000
11/30/22	Johnson Bank	Racine, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$9,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
11/30/22	BMO	Kenosha, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$8,000
11/30/22	BMO	South Milwaukee, WI	Castracucco Ajayi-Obe Ramos Accurso	None	\$1,000
12/1/22	Monona Bank	Cottage Grove, WI	Castracucco Ajayi-Obe Ramos Accurso	\$4,500	\$6,000
12/1/22	Monona Bank	Monona, WI	Castracucco Ajayi-Obe Ramos Accurso	None	\$4,000
12/15/22	Bank of Utah	Layton, UT	Castracucco Ajayi-Obe	None	\$6,500
12/15/22	Bank of Utah	Ogden, UT	Castracucco Ajayi-Obe	\$4,500	\$9,000
12/16/22	First Utah Bank	Sandy, UT	Castracucco Ajayi-Obe	\$4,500	\$7,000
12/16/22	Zions Bank	Riverton, UT	Castracucco Ajayi-Obe	\$4,200	\$9,000
12/16/22	Zions Bank	Saratoga Spring, UT	Castracucco Ajayi-Obe	\$4,500	None
1/5/23	Simmons Bank	Cabot, AR	Ajayi-Obe Ramos Accurso Skiesto	\$4,200	None
1/5/23	Simmons Bank	Conway, AR	Ajayi-Obe Ramos Accurso Skiesto	\$4,500	\$6,500
1/13/23	First Horizon Bank	New Orleans, LA	Ajayi-Obe Ramos Sedberry Skiesto	\$4,500	\$8,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
1/13/23	First Horizon Bank	Metairie, LA	Ajayi-Obe Ramos Sedberry Skiesto	None	\$5,000
1/13/23	First Horizon Bank	Kenner, LA	Ajayi-Obe Ramos Sedberry Skiesto	\$4,500	\$8,000
1/13/23	First Horizon Bank	Metairie, LA	Ajayi-Obe Ramos Sedberry Skiesto	None	\$6,500
1/20/23	FirstBank	Loveland, CO	Ajayi-Obe Ramos Accurso Skiesto	\$4,500	\$6,000
1/20/23	FirstBank	Boulder, CO	Ajayi-Obe Ramos Accurso Skiesto	None	\$4,000
1/20/23	First Interstate Bank	Louisville, CO	Ajayi-Obe Ramos Accurso Skiesto	\$4,500	\$5,000
2/9/23	Waukesha State Bank	Menomonee Falls, WI	Ajayi-Obe Ramos Grodner Valsechi	\$4,500	\$6,000
2/9/23	Wisconsin Bank & Trust	Green Bay, WI	Ajayi-Obe Ramos Grodner Valsechi	\$4,500	\$6,000
2/10/23	Town Bank	Delafield, WI	Ajayi-Obe Ramos Grodner Valsechi	\$4,500	\$6,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
2/10/23	Town Bank	Wales, WI	Ajayi-Obe Ramos Grodner Valsechi	None	\$6,200
2/10/23	Ixonia Bank	Oconomowoc, WI	Ajayi-Obe Ramos Grodner Valsechi	\$4,500	\$6,000
2/15/23	BancFirst	Yukon, OK	Ajayi-Obe Grodner Valsechi	\$4,500	None
3/1/23	UMB Bank	Kansas City, KS	Ajayi-Obe Grodner Valsechi	\$4,500	\$8,200
3/1/23	UMB Bank	Kansas City, KS	Ajayi-Obe Grodner Valsechi	None	\$7,200
3/2/23	UMB Bank	Kansas City, MO	Ajayi-Obe Grodner Valsechi	\$4,500	\$7,500
3/2/23	Commerce Bank	Kansas City, MO	Ajayi-Obe Grodner Valsechi	\$4,500	\$8,000
3/16/23	UMB Bank	Maryland Heights, MO (within the Eastern District of Missouri)	Ajayi-Obe Grodner Ramos Viruet-Stevens	\$4,500	None
9/27/23	Bangor Savings Bank	Scarborough, ME	Ajayi-Obe Keenan	\$4,400	\$5,500
9/27/23	Bangor Savings Bank	South Portland, ME	Ajayi-Obe Keenan	\$4,100	None
9/27/23	Camden National Bank	York, ME	Ajayi-Obe Keenan	None	\$5,000
12/4/23	Manasquan Bank	Manasquan, NJ	Ajayi-Obe Keenan	\$4,260	\$5,300
12/21/23	Washington Trust	Cranston, RI	Ajayi-Obe Keenan	\$4,200	\$6,000

Date	Bank	City, State	Conspirators on Trip	Actual / Attempted Counterfeit Check Deposit Amount	Actual / Attempted Withdrawal Amount
12/22/23	Washington Trust	Johnston, RI	Ajayi-Obe Keenan	\$4,300	\$5,200
12/27/23	Partners Bank	Portsmouth, NH	Ajayi-Obe Keenan	\$4,300	\$5,200
1/2/24	Maine Community Bank	Kennebunk, ME	Ajayi-Obe Keenan	\$4,300	\$6,200
1/8/24	Norway Savings Bank	Portland, ME	Ajayi-Obe Keenan	\$4,300	\$6,400
1/17/24	Norway Savings Bank	South Portland, ME	Ajayi-Obe Keenan	None	\$6,300
2/21/24	Bristol County Savings Bank	Cumberland, RI	Ajayi-Obe Keenan	\$4,300	None
			TOTAL	\$293,760	\$452,100

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Bank Fraud: 18 U.S.C. §§ 1344 and 2)

39. The above paragraphs are hereby realleged and incorporated by reference.

40. On or about March 16, 2023, Defendant Ajayi-Obe, Defendant Grodner, Defendant Ramos, and Ruben Viruet-Stevens flew together from LaGuardia Airport to St. Louis Lambert International Airport.

41. When the group arrived in St. Louis, Defendant Ajayi-Obe rented a car from Enterprise Rent-A-Car.

42. Defendant Ramos then drove the rental car to UMB Bank in Maryland Heights, Missouri, within the Eastern District of Missouri, with Defendant Grodner riding in the front passenger seat of the car and Ruben Viruet-Stevens riding in the backseat of the car.

43. While Defendant Ramos and Ruben Viruet-Stevens (who was observing and learning the mechanics of the bank-fraud scheme so that he could become a driver) sat in the car, Defendant Grodner went inside the bank with a counterfeit United States passport card that had been supplied by Defendant Ajayi-Obe after Defendant Resto manufactured it at Defendant Gil's direction. The counterfeit passport card contained victim account holder C.J.V.'s name and date of birth but displayed Defendant Grodner's photograph. Before Defendant Grodner went inside the bank, Defendant Ajayi-Obe provided him with other personally identifiable information of victim account holder C.J.V., as well as C.J.V.'s business, which had been provided to Defendant Ajayi-Obe by Defendant Gil. After Defendant Grodner went inside the bank, he used the counterfeit passport card to impersonate C.J.V. and attempted to deposit a counterfeit check into C.J.V.'s business's legitimate account at the bank.

44. On or about March 16, 2023, within the Eastern District of Missouri and elsewhere, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS,
OLADIRAN AJAYI-OBE a/k/a "TJ",
PAVEL GIL a/k/a "SUPREME", and
GIOVANNI RESTO a/k/a "G2",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, that is, UMB Bank, which is FDIC-insured, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of such financial institution by means of material false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE
(Use of False Passport: 18 U.S.C. §§ 1543 and 2)

45. The above paragraphs are hereby realleged and incorporated by reference.

46. On or about March 16, 2023, within the Eastern District of Missouri and elsewhere,
the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS,
OLADIRAN AJAYI-OBE a/k/a “TJ”,
PAVEL GIL a/k/a “SUPREME”, and
GIOVANNI RESTO a/k/a “G2”,**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, willfully and knowingly used, attempted to use, and furnished to another for use a false, forged, and counterfeited passport and instrument purporting to be a passport, to wit, a counterfeit United States passport card that contained the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner.

All in violation of Title 18, United States Code, Sections 1543 and 2.

COUNT FOUR
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

47. The above paragraphs are hereby realleged and incorporated by reference.

48. On or about March 16, 2023, within the Eastern District of Missouri and elsewhere,
the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS,
OLADIRAN AJAYI-OBE a/k/a “TJ”,
PAVEL GIL a/k/a “SUPREME”, and
GIOVANNI RESTO a/k/a “G2”,**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being bank fraud in violation of 18 U.S.C. § 1344, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit, a counterfeit United States passport card that contained the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS FIVE–NINE
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

49. The above paragraphs are hereby realleged and incorporated by reference.

50. On or about March 16, 2023, within the Eastern District of Missouri and elsewhere, the defendants,

**MICHAEL GRODNER,
OLADIRAN AJAYI-OBE a/k/a “TJ”,
PAVEL GIL a/k/a “SUPREME”, and
GIOVANNI RESTO a/k/a “G2”,**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being a conspiracy to commit bank fraud in violation of 18 U.S.C. § 1349, knowingly transferred and possessed, without lawful authority, a means of identification of another person, described below for each count, knowing that the means of identification belonged to another actual person:

Count	Means of Identification
5	Counterfeit United States passport card that contained the name and date of birth of C.A.E.
6	KeyBank credit card that contained the name of C.A.E.
7	Counterfeit United States passport card that contained the name and date of birth of M.C.O.
8	Counterfeit United States passport card that contained the name and date of birth of K.G.T.
9	KeyBank credit card that contained the name of K.G.T.

All in violation of Title 18, United States Code, Sections 1028A and 2.

FORFEITURE ALLEGATION

The Grand Jury further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(2), upon conviction of a conspiracy to violate Title 18, United States Code, Section 1344, affecting a financial institution, as set forth in Count One, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting, or derived from, any proceeds traceable to such violation.
3. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without
difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to
Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

Justin M. Ladendorf #68558MO
Assistant United States Attorney